

Statement of Michael McClellan, M. D.

State of Ohio)
)
) ss.
County of Hamilton)

I, Michael McClellan, M.D., after being duly cautioned and sworn state the following on the basis of my own personal knowledge.

1. I am a physician specializing in the practice of internal medicine and am licensed to practice medicine in the State of Ohio. My curriculum vitae is attached.

2. Over the past twelve months I have served as Mr. Eric Jeffries' primary care physician and have seen Mr. Jeffries frequently concerning his difficulties with myalgias, polyarthralgias, abdominal pains, severe headaches, eye problems, rashes, fatigue, lethargy, disorientation, and various other body aches.

3. After seeing Mr. Jeffries many times and spending hours evaluating his symptoms, I am as certain as I can possibly be that Mr. Jeffries' symptoms are real and have a significant debilitating effect on Mr. Jeffries. I believe he is disabled even though specific diagnostic tests have failed to yield a precise diagnosis or common name for his illness. This inability to name Mr. Jeffries' illness is unfortunately not uncommon. In Mr. Jeffries' case, several diseases have been considered including Bechet's disease, porphyria, autoimmune disorders, and paroxysmal nocturnal hemoglobinuria.

4. Mr. Jeffries began to experience these symptoms shortly after receipt of a hepatitis B vaccination and I suspect that Mr. Jeffries suffered some enigmatic autoimmune reaction to the immunization. Vaccinations are known to trigger a person's immune system and tests on Mr. Jeffries do show an elevated level of immune system activity.

5. While it is uncommon to be unable to diagnose autoimmune disorders in general, it is not altogether surprising in this case given that the specific trigger (the Hepatitis B vaccine) would not be expected to evoke other common markers for autoimmune diseases. *✓*

6. It is my opinion that irrespective of the inability to precisely diagnose Mr. Jeffries' condition, the effects of his illness make him unable to perform the material and substantial duties of his occupation of a merchant banker.

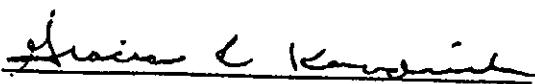
Further Affiant Sayeth Naught.


Michael McClellan, M.D.

Notary Public

Before me appeared Michael McClellan, M. D., who after being duly cautioned and sworn, signed his name above.

Notary Public, State of Ohio
My Commission Expires 6-4-2001


Gracia L. Kendrick